

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

PASTOR BENJAMIN A. JOHNSON, DR.  
RONALD A. LUNDEEN, and PASTOR  
ARTHUR F. HAIMERL on behalf of  
themselves and all others similarly situated,  
  
Plaintiffs,

v.

EVANGELICAL LUTHERAN CHURCH  
IN AMERICA AND THE BOARD OF  
PENSIONS OF THE EVANGELICAL  
LUTHERAN CHURCH IN AMERICA,  
  
Defendants.

Court File No. 11-cv-00023 (MJD-LIB)

**DECLARATION OF ALISON B.  
WILLARD IN OPPOSITION TO  
PLAINTIFFS' MOTION TO STRIKE  
THE EXPERT REPORT OF JOHN  
LANGBEIN (DKT. NO. 236-1)**

I, Alison B. Willard, declare as follows:

1. I am an associate with the law firm of Morgan, Lewis & Bockius LLP ("Morgan Lewis"), attorneys for defendant Board of Pensions of the Evangelical Lutheran Church in America (the "Board"). In my capacity as an associate with responsibility for managing the defense of this litigation, I have personal knowledge of the factual information stated in this declaration.

2. Attached as Exhibit A is a copy of the Supplemental Expert Report of Mark Johnson, Ph. D, J.D., which plaintiffs served on the Board on March 28, 2013.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 8th day of July 2013, in San Francisco, California.

s/ Alison B. Willard  
Alison B. Willard